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March 10, 2023

VIA ECF

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street, Courtroom 521
White Plains, New York 10601

Re: Finn v. Empress Ambulance Services, Inc. d/b/a Empress EMS, Case No. 7:22-cv-08101-KMK (the "Finn Action")

Dear Judge Karas:

As you know, we represent Defendant Empress Ambulance Service, LLC ("Empress") in the above-captioned *Finn* Action. Empress writes jointly with Plaintiff John Finn ("Plaintiff") pursuant to the Court's November 14, 2022 Order [Dkt. No. 17] requiring the parties to the *Finn* Action to submit joint status reports to the public docket providing updates on the progress of settlement negotiations every 14 days. The ninth status report is due today, March 10, 2023.

Since the parties' previous status report, they have continued to meet and confer and conduct diligent settlement negotiations. Specifically, the parties have been working to avoid jurisdictional objections and have been negotiating the specific terms of the settlement agreement.

The parties have made significant progress over the past two weeks towards finalizing the settlement terms and agreement. Therefore, we respectfully request that the Court continue to stay the later-filed actions during this process. The parties will continue making progress on the settlement during the next two weeks and, in accordance with the Court's November 14, 2022 Order, will provide another status update on March 24, 2023.

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Respectfully submitted,



Casie D. Collignon

cc: All counsel of record (via ECF)